

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
)	
Telecommunications Carriers Eligible to)	
Receive Universal Service Support)	
)	
Total Call Mobile, Inc.)	WC Docket No. 09-197
)	
Petition for Limited Designation as)	
An Eligible Telecommunications)	
Carrier in Alabama, Connecticut, Delaware,)	
the District of Columbia, Florida,)	
New Hampshire, New York, North Carolina,)	
Tennessee, and Virginia)	
)	

**TOTAL CALL MOBILE, INC.
AMENDED PETITION FOR LIMITED DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN ALABAMA, CONNECTICUT, DELAWARE,
THE DISTRICT OF COLUMBIA, FLORIDA, NEW HAMPSHIRE, NEW YORK,
NORTH CAROLINA, TENNESSEE, AND VIRGINIA**

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Dated: October 10, 2012

SUMMARY

In this amended petition, Total Call Mobile, Inc. (“TCM”) seeks designation as an eligible telecommunications carrier (“ETC”), pursuant to Section 214(e)(6) of the Communications Act of 1934, as Amended (the “Act”) and Federal Communications Commission (“FCC” or “Commission”) rules, for the limited purpose of providing wireless services supported by the Universal Service Fund’s Lifeline program. Section 214(e)(6) permits the Commission to grant ETC designation in those states where the state has affirmatively stated an ETC Petitioner is not subject to state jurisdiction. The States of Alabama, Connecticut, Delaware, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia and the District of Columbia all have stated they lack jurisdiction over wireless service providers and, consequently, Commission review and approval of TCM’s Petition is warranted.

TCM originally filed its Petition for designation as an ETC in March 2012, shortly after the FCC’s *Lifeline Reform Order*. Since that time, certain rules adopted in the *Lifeline Reform Order* have taken effect and certain of the new requirements have been clarified. In addition, TCM has updated its Lifeline offerings to better serve low income customers. This amended petition reflects these changes.

As described in greater detail herein, TCM satisfies all of the requirements for designation as an ETC and is committed to complying with all of the Commission’s rules and requirements for ETCs providing Lifeline services. Grant of ETC status will be in the public interest as TCM’s provision of Lifeline-supported services will further the Commission’s goals of the Lifeline program by increasing the service options available to low income consumers. Further, TCM’s prepaid wireless services will provide an important source of high quality service with the benefits of mobile service. Low income consumers will have a stable contact

method where traditional landline service is unavailable or not a viable option. Additionally, the prepaid nature of TCM's services permit consumers to anticipate and control their communications costs. TCM's Lifeline service offering includes a generous number of "free" minutes that are an invaluable resource for cash-strapped consumers and features such as voicemail that are critical to those seeking employment. Designation of TCM as an ETC will provide consumers with a valuable alternative for obtaining telephone service and this competition should spur other service providers to improve their service offerings to low income consumers.

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THE DISTRICT OF COLUMBIA, FLORIDA, NEW HAMPSHIRE, NEW YORK,
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Total Call Mobile, Inc. (“TCM” or the “Company”), pursuant to Section 214(e) of the Communications Act of 1934, as Amended (the “Act”), 47 U.S.C. § 214(e) and Section 54.202 of the rules of the Federal Communications Commission (“Commission” or “FCC”), 47 C.F.R. §54.202, hereby requests limited designation as an eligible telecommunications carrier (“ETC”) in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee, and Virginia (hereinafter, “Initial ETC States”), for the sole purpose of receiving universal service Lifeline support. TCM does not request ETC status

for the purpose of receiving support from any of the other Universal Service Funds (“USF”), nor does it seek support from the Link Up program.

TCM originally filed its Petition for designation as an ETC in March 2012, shortly after the FCC’s *Lifeline Reform Order*. Since that time, certain rules adopted in the *Lifeline Reform Order* have taken effect and certain of the new requirements have been clarified. In addition, TCM has updated its Lifeline offerings to better serve low income customers. This amended petition reflects these changes.

The Initial ETC States all have affirmatively stated they lack jurisdiction or will not assign ETC status to commercial mobile radio service (“CMRS”) providers. Accordingly, the Commission has jurisdiction, pursuant to Section 214(e)(6) to review and grant the Company’s request for designation as an ETC in the Initial ETC States. As discussed in more detail below, TCM meets the requirements for designation as an ETC and is able and prepared to offer the USF-supported services throughout the Initial ETC States. Granting TCM ETC status will benefit the public interest by making the Company’s services available to a broad range of low income consumers.

I. ABOUT TCM

TCM is a mobile virtual network operator (“MVNO”) that provides wireless mobile phone services to consumers across the United States. Sprint provides TCM with all the network infrastructure and wireless transmission facilities on which TCM operates and provides services to its customers. As a reseller of wireless services, TCM purchases wireless network services from Sprint on a wholesale basis and resells these services to its customers. TCM provides affordable prepaid mobile phone service, including calling and text messaging, along with user-friendly handsets and high quality customer service. The majority of TCM’s products and plans are specially geared toward serving lower income communities, and its service models

and pricing plans reflect this mission. For prepaid services, TCM does not require minimum terms from its customers and it ensures competitive low pricing for its services and products. By providing affordable service, TCM can reach out to those who are often ignored by traditional carriers.

TCM manages and markets all aspects of the customer experience, including setting service pricing, handset selection, marketing materials, and live customer service. TCM's prepaid, budget-friendly pricing has given many low-income consumers the option of having basic mobile phone service without the burden of hidden costs, varying monthly charges, or contractual commitments. Customers are able to customize their mobile phone service to suit their needs with TCM's pay-as-you-go rechargeable mobile phone plans.

Based upon internal surveys, a substantial portion of TCM's customers are low-income consumers who earn under \$25,000 per year. TCM's customers depend on and benefit greatly from TCM's inexpensive and flexible pricing model. TCM does not impose credit checks nor does it require any contractual minimum terms. In addition, most of TCM's customers turn to TCM because they cannot afford the postpaid services provided by traditional carriers. TCM affirmatively reaches out to the very low-income sector of the consumer base to offer attractive and affordable communications options. As such, TCM contributes to the expansion of wireless services for low-income consumers and intends to seek ETC designation in states and territories where it already has a strong customer base so that it may continue to expand the service options for low-income consumers.

II. THE PUBLIC UTILITY COMMISSIONS IN EACH OF THE INITIAL ETC STATES HAVE AFFIRMATIVELY STATED THEY DO NOT REGULATE CMRS CARRIERS FOR PURPOSES OF GRANTING ETC DESIGNATIONS

Section 214(e)(2) of the Act assigns state public utility commissions the authority to designate ETC status to most requesting entities.¹ Section 214(e)(6) permits the FCC, rather than a state public utility commission, to designate a Petitioner as an ETC in cases involving a “common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a State commission.”² The FCC has stated that before it will consider an ETC application, the entity seeking ETC status must demonstrate that it “is not subject to the jurisdiction of a state commission”³ and the entity must provide an “affirmative statement” from the relevant state commission that the carrier is not subject to the state commission’s jurisdiction.⁴

As demonstrated in the documents attached as Exhibit A, the public utility commission in each of the Initial ETC States has affirmatively stated that it lacks jurisdiction to designate ETC status. Because the state public utility commissions in the Initial ETC States have specifically and affirmatively denied jurisdiction over CMRS providers for purposes of granting ETC status, TCM is not subject to state commission jurisdiction in any of the states for which it hereby seeks an ETC designation. The Commission therefore has jurisdiction to grant ETC status in these states pursuant to Section 214(e)(6) of the Act. The FCC has recognized this

¹ 47 U.S.C. § 214(e)(2).

² 47 U.S.C. § 214(e)(6).

³ *See Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, 12 FCC Rcd 22947 (1997).

⁴ *See Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas*, 15 FCC Rcd 12208, ¶ 7 (2000).

jurisdiction previously, and has granted ETC authority to applicants for the Initial ETC States.⁵

Accordingly, FCC review and approval of the instant application is warranted.

III. TCM MEETS THE COMMISSION'S REQUIREMENTS FOR ETC DESIGNATION

Section 54.202 of the Commission's rules outlines the requirements that must be met before a carrier can be designated as an ETC by the FCC. As discussed in further detail below, TCM meets these requirements and ETC designation in the Initial ETC States is warranted.

a) *TCM is a common carrier.*⁶

TCM is a mobile virtual network operator ("MVNO") that provides wireless services to consumers across the United States by reselling the services of Sprint. TCM offers its mobile services on a common carrier basis, has registered with the Commission and pays Universal Service Fund contributions on a consolidated basis with its parent, Total Call International, Inc. Further, section 332(c)(1)(A) of the Act states that CMRS providers will be regulated as common carriers.⁷ Accordingly, TCM is a common carrier.

b) *TCM will Provide the Lifeline-Eligible Services by Reselling the Services of Sprint.*

Section 214(e)(1)(A) of the Act states that an ETC must provide services "using its own facilities or a combination of its own facilities and resale of another carrier's services."⁸ By Petition dated May 25, 2011, TCM sought forbearance from the "own facilities" requirement

⁵ *Telecommunications Carriers Eligible for Universal Service Support, Order, 27 FCC Rcd 6263, 6267 (¶ 12) (2012) (i-Wireless/Cricket Designation Order).*

⁶ 47 C.F.R. § 54.201(b).

⁷ 47 U.S.C. § 332(c)(1)(A).

⁸ 47 U.S.C. § 214(e)(1)(A).

and by Order dated February 6, 2012, TCM's Petition for Forbearance was granted.⁹ The Commission conditioned grant of the Petition on TCM's compliance with certain ETC obligations including: providing 911 and E911 service regardless of activation status and prepaid minutes available, providing E911-compliant handsets and replacing non-compliant handsets, at no charge to the consumer, for Lifeline customers upon the effective date of the *Lifeline Reform Order*.¹⁰ In addition, TCM was required to file and have approved, a compliance plan which includes specific information about TCM's service offerings and outlines the measures TCM will take to implement the obligations established in the *Lifeline Reform Order* as well as other measures to prevent waste, fraud and abuse that the Commission may deem necessary.¹¹ TCM filed its revised compliance plan (the "Revised Compliance Plan") on May 14, 2012, attached hereto as Exhibit B, and the Commission approved the Revised Compliance Plan by Public Notice dated May 25, 2012.¹² As a result of the grant of forbearance and approval of its Compliance Plan, TCM complies with the "own facilities" requirement of Section 214(e)(1)(A).

c) *TCM certifies it will comply with the service requirements applicable to the support the Company receives.*¹³

TCM provides voice telephony service as supported by the Lifeline program and will make its services available to all qualified consumers throughout the Initial ETC States.¹⁴

⁹ See *In re: Lifeline and Link Up Reform and Modernization*, 27 FCC Rcd 6656, ¶¶ 368, n. 982 (2012) ("Lifeline Reform Order").

¹⁰ *Lifeline Reform Order*, ¶ 373.

¹¹ *Lifeline Reform Order*, ¶ 368.

¹² See Public Notice, WC Dkt. Nos. 09-197, 11-42 (May 25, 2012).

¹³ 47 C.F.R. § 54.202(a)(1).

¹⁴ 47 C.F.R. § 54.10(a) (listing requirements for "voice telephony services"). In addition to voice telephony services, TCM's services include the nine features, *i.e.*, dual tone multi-frequency signaling, single party service and access to operator services, *etc.* previously identified in Commission rule 54.101(a).

The Company seeks designation as an ETC to provide Lifeline service in the rural and non-rural study areas provided in Exhibit C. TCM understands that its service area includes the service areas of several rural carriers, however, the public interest factors discussed below and the Commission's precedent in granting ETC designation in such areas justifies this designation as an ETC for purposes only of participation in the Lifeline program.

TCM's services include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, TCM's services offerings provide its customers with a specified number of minutes of use for local service at no charge to the customer. The Company will offer a set number of minutes of local exchange service free of charge to its subscribers and will abide by any Commission-required minimum usage amounts. TCM's Lifeline offering will allow customers to choose from the following options: (1) 150 minutes (including select international destinations as described in Exhibit D) per month at no charge (customer may use text messaging with each text consuming 1 minute from this plan); (2) 250 minutes (domestic only) per month at no charge (customer may use text messaging with each text consuming 1 minute from this plan); or (3) a \$10 discount off of TCM's 30-day Unlimited Talk & Text plan; TCM's 30-day Unlimited Talk, Text, & Data plan; or TCM's 30-day 1,000 talk minutes (domestic only) and 1,000 texts plan.¹⁵ Additional plan details are described on the sample advertisement attached as Exhibit E and in Exhibit F. Lifeline customers can also purchase additional minutes and service (*i.e.* if they run out of minutes or if

¹⁵ Since the Commission approved TCM's Revised Compliance Plan (dated May 14, 2012 on May 25, 2012, TCM has amended its Lifeline offering to become more competitive and to address the change in the federal subsidy as follows: (1) for the 150 minute plan and the 250 minute plan, Lifeline customers may now use their plan minute allocation for text messaging (*i.e.* for every text, 1 plan-minute is consumed); (2) TCM now allows Lifeline customers to buy the 1000 Talk & 1000 Text plan at a \$10 discount (*i.e.* for \$19.99 instead of the regular \$29.99); and (3) TCM changed the discount for Lifeline customers off of retail to \$10 from \$13.25 to reflect the reduction in subsidy from USAC.

they want to make international calls) by purchasing TCM's refill cards online, via the customer service line, at Western Union locations, and at stores that carry TCM prepaid refills.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compatible handsets. As discussed above, TCM will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets. Calls to all emergency services are always free, regardless of service activation or availability of minutes.

Finally, toll limitation services do not apply because TCM, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for in advance. Pursuant to the *Lifeline Reform Order*, subscribers to such services are not considered to have voluntarily elected to receive TLS.¹⁶

d) *TCM has the ability to remain functional in emergency situations.*¹⁷ As discussed in more detail above, TCM utilizes the Sprint network to provide TCM's mobile services. The Company has access to the extensive and well-established Sprint network and facilities, which are capable of managing traffic spikes that occur during emergency situations and can reroute traffic in the event of damaged facilities. TCM also has reason to believe that Sprint has sufficient back-up power to ensure functionality if its external power supply is unavailable.

e) *TCM will satisfy applicable consumer protection and service quality standards.*¹⁸

¹⁶ See *Lifeline Reform Order*, ¶ 230.

¹⁷ 47 C.F.R. § 54.202(a)(2).

¹⁸ 47 C.F.R. § 54.202(a)(3)

Section 54.202(a)(3) of the Commission's rules states that a wireless applicant's commitment to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service ("CTIA Consumer Code") will satisfy this consumer protection and service quality requirement. TCM intends to fully comply with applicable consumer protection requirements and commits to comply with the CTIA Consumer Code. Similar to Virgin Mobile's pledge in its recently-granted New Hampshire ETC application,¹⁹ TCM agrees to comply with the CTIA Consumer Code to ensure the Company offers its subscribers the highest level of protection and quality service. TCM's pledge to provide quality service and voluntarily to comply with this code evidences its commitment to satisfying all of the applicable consumer protection and service quality standards.

f) TCM is financially and technically capable of providing Lifeline services in compliance with the Commission's rules.

Revised Commission rule 54.202(a)(4), 47 C.F.R. 54.204(a)(4), requires ETC Petitioners to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.²⁰ Among the factors the Commission considers are: a Petitioner's prior offering of service to non-Lifeline subscribers, the length of time the Petitioner has been in business, whether the Petitioner relies exclusively on Lifeline reimbursement to operate; whether the Petitioner receives revenues from other sources and whether the Petitioner has been the subject of an enforcement action or ETC revocation proceeding.

As discussed in Section II *supra*, TCM provides telecommunications services nationwide and is the wholly-owned subsidiary of a national prepaid telecommunications

¹⁹ See *In re: Federal-State Joint Board on Universal Service Virgin Mobile USA, L.P. Petition for Limited Designation as an Eligible Telecommunications Carrier in the State of New Hampshire*, WC Dkt. No. 09-197, at 16-17 (filed Feb. 17, 2010).

²⁰ *Lifeline Reform Order*, ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

services provider. TCM's parent, Total Call International, has been providing telecommunications services to customers for over 10 years. During this time, TCM and its parent have provided prepaid wireless services to non-Lifeline customers and, consequently, TCM has not and will not be relying exclusively on Lifeline reimbursement for the Company's operating revenues. TCM receives revenues from these prepaid wireless services and also has the financial support of Total Call International's parent company, KDDI America (which is a wholly owned subsidiary of KDDI of Japan, the second largest telecommunications company in Japan). TCM has not been the subject of any enforcement actions by the FCC nor has it been subject to any ETC revocation proceedings.

(g) Terms and conditions of TCM's voice telephony service plans for Lifeline subscribers.

As noted in Section III(c) *supra*, TCM offers Lifeline subscribers a variety of voice telephony service plans. TCM's Lifeline subscribers are also eligible to select certain plans (*i.e.* 30-day Unlimited Talk & Text or 30-day Unlimited Talk, Text, & Data) that TCM generally makes available to the public, but at a discount from retail. TCM will review its Lifeline service plans periodically to ensure that they remain competitive in the marketplace, and may adjust these plans from time to time.

h) TCM will comply with the other regulations applicable to ETCs including:
(a) providing service throughout its proposed service area; (b) offering a variety of local usage plans; (c) verifying and certifying a consumer's eligibility to participate in the Lifeline program; (d) submitting annual certifications and reports; and (e) recognizing equal access requirements.

TCM is committed to operating as an ETC in accordance with all of the regulations applicable to ETCs. As described in section I, *supra*, the Company is seeking ETC

designation throughout the Initial ETC States and intends to provide service to all customers in TCM's service areas. TCM's service areas will cover those rural and non-rural study areas set forth in Exhibit C. TCM's Lifeline service offerings include plans with different numbers of minutes of use and features and customers also have the option of purchasing additional minutes of use. As a result, customers are able to craft and purchase service packages that best meet their needs and budgets. Additional information about the Company's service offerings are attached hereto as Exhibits D, E, and F.

TCM is aware of the Commission's current requirements regarding certification and verification of a customer's qualification for Lifeline service and has implemented procedures to ensure the requirements are met. As detailed in TCM's Revised Compliance Plan (*see* Exhibit B), as approved by the Commission on May 25, 2012, TCM has comprehensive procedures in place to obtain customer certifications, to verify customer eligibility, to provide de-enrollment upon 60-days' non-usage, and to protect against duplication of service. TCM also has direct dealings with its customers and requires, upon service activation and every year thereafter, the customers to self-certify that the customer: (i) is the head of their household and receives Lifeline-supported services only from TCM. TCM also complies with the Commission's notification and de-enrollment obligations regarding customers that no longer qualify for Lifeline services.²¹

These procedures comply with the annual re-certification and reporting requirements, and TCM voluntarily commits to abide by the requirements the Commission

²¹ 47 C.F.R. § 54.405(e).

applied to a recent ETC grant for Virgin Mobile regarding measures to prevent waste, fraud and abuse of Lifeline services.²²

TCM understands that ETCs must provide equal access to long distance carriers if all other ETCs in the same service area choose to relinquish their ETC status.²³ The Company commits to offer equal access to long distance carriers to the extent required by law (if applicable).

*(i) TCM advertises the availability of its service and charges in a manner reasonably designed to reach Lifeline-eligible consumers and will comply with the Commission's revised rules regarding information to be included in advertisements.*²⁴

TCM plans to advertise its Lifeline services in a cost-effective manner using various media and distribution, including newspapers of general circulation, radio and television, and distribution through local distributors, governmental agencies, and nonprofits. In addition to using these advertising activities, the Company intends to reach Lifeline eligible customers via targeted advertising and marketing, including direct mail and direct to consumer events.²⁵ All of TCM's Lifeline advertising materials (*e.g.* brochures, websites, etc.) comply with the Commission's revised rule section 54.405(c). Specifically, TCM's advertising materials will state, in easily understood language, that: (i) the service is a Lifeline service; (ii) Lifeline is a government assistance program; (iii) the service may not be transferred to someone else; (iv) consumers must meet certain eligibility requirements before enrolling in the Lifeline

²² 47 C.F.R. §§ 54.416, 54.422. *See also In re: Telecommunications Carriers Eligible for Universal Service Support; Virgin Mobile USA, L.P. Petition for Designation as an Eligible Telecommunications Carrier in the State of Alabama, et al.*, 25 FCC Red 17797, ¶ 24 (2010) ("2010 Virgin Mobile ETC Order").

²³ *See, e.g., 2010 Virgin Mobile ETC Order*, ¶ 5.

²⁴ 47 C.F.R. §§ 54.201(d)(2), 54.405(b).

²⁵ *See* 47 C.F.R. § 54.405(b).

program; (v) the Lifeline program permits only one Lifeline discount per household; (vi) documentation is necessary for enrollment; and (vii) TCM is the provider of the services.

IV. THE PUBLIC INTEREST WILL BENEFIT FROM GRANTING ETC STATUS TO TCM

The Commission's rules require that, before granting a request for ETC designation, the Commission must find that grant of the designation would be in the public interest.²⁶ In determining if the public interest showing has been met, the Commission considers the "benefits of increased consumer choice and the unique advantages and disadvantages of the applicant's service offering."²⁷ In addition, the principal goal of the Lifeline program is to make affordable telecommunications services available to low-income consumers.²⁸

Similar to the Commission's findings justifying grant of ETC designation to other petitioners, designation of TCM as an ETC for Lifeline purposes will further the Commission's goals for the Lifeline program. Specifically, the Company will offer prepaid wireless services to low-income consumers thereby increasing consumer choice and expanding the number of affordable telecommunications services available to low-income consumers.²⁹ Further, grant of the application will provide consumers with access to high quality service and the benefits of a mobile service.³⁰ The mobility of the service will be particularly attractive to Lifeline-eligible consumers who may frequently change residences or work in migratory jobs. Wireless service

²⁶ 47 C.F.R. § 54.202(b).

²⁷ See, e.g., *2010 Virgin Mobile ETC Order*, ¶ 6.

²⁸ See, e.g., *Lifeline and Link-Up*, 19 FCC Rcd 8302 (2004).

²⁹ See, e.g., *Virgin Mobile USA, L.P. Petition for Forbearance from 47 USC §214(e)(1)(A)*, Order, FCC 09-18, ¶ 38 (rel. March 5, 2009) ("2009 Virgin Mobile Forbearance/ETC Order").

³⁰ *2009 Virgin Mobile Forbearance/ETC Order*, ¶ 38. As discussed above, TCM will comply with the Consumer Code for Wireless Service of CTIA – The Wireless Association.

therefore offers a stable contact method where traditional landline service would be unavailable or not a viable option. TCM's prepaid wireless service (which includes Lifeline) is an especially attractive option for low-income consumers because it alleviates customer concerns regarding hidden costs, varying monthly charges and long term contract issues. In the current declining economy, many consumers are faced with making difficult choices about how to allocate and spend their limited resources. The ability to meet their communications needs while at the same time anticipating and controlling the associated costs is critical. TCM's prepaid service offerings and rechargeable mobile phone plans enable customers to tailor their wireless services to their needs and budgets and the prepaid nature of the service also provides an alternative for "unbanked" consumers. In addition, if a Lifeline customer consumes all of their minutes, they can reload with any TCM prepaid refill. Further, TCM does not impose credit checks for Lifeline and prepaid services, thereby providing an alternative for those low income consumers unable to obtain credit for post-paid services provided by traditional carriers.

TCM's Lifeline prepaid mobile calling service packages provide low income consumers with a generous number of included, anytime minutes, the consumers voicemail, features at no additional charge, and calls to 911 services. These free minutes and services are an invaluable resource for cash-strapped consumers who may be seeking employment and need a means to contact potential employers. The packages are also useful for those consumers that need the ability to stay in touch with children or other family members while also providing the ability to contact 911 emergency services when needed. TCM's services will provide consumers with a valuable alternative for obtaining telephone service and this competition in turn could spur other service providers to improve their service options.

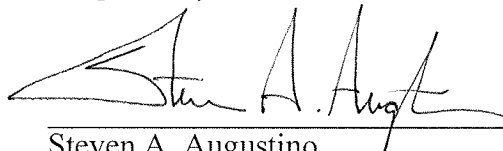
V. ANTI-DRUG ABUSE CERTIFICATION

TCM certifies that no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 862. A copy of a certification signed by TCM's COO is attached as Exhibit G.

VI. CONCLUSION

For the foregoing reasons, TCM asserts that grant of the instant Petition for Limited Designation as an Eligible Telecommunications Carrier is in the public interest and is warranted in accordance with 47 U.S.C. § 214(e)(6) of the Act.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Steven A. Augustino", is written over a horizontal line.

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